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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Consider
Streamlining Interconnection of Distributed
Energy Resources and Improvements to Rule 21.

Rulemaking 17-07-007
(Filed July 13, 2017)

**MOTION OF THE INTERSTATE RENEWABLE ENERGY COUNCIL, INC. TO
REVISE CERTAIN DEADLINES OF THE R.17-07-007 SCOPING MEMO**

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DATED: July 9, 2018

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Pursuant to Rule 11.1 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the Interstate Renewable Energy Council, Inc. (“IREC”) submits this Motion for an extension of deadlines for Working Group Two. This extension has been discussed at the meetings of Working Group Two, and the active participants have expressed support for this extension. On June 29, 2018, IREC solicited input from the participant list of Working Group Two. On July 3, 2018, IREC circulated the proposed motion and solicited input from the service list for R.17-07-007. Twelve stakeholders responded, and all that responded supported the motion. Pacific Gas & Electric, Southern California Edison, San Diego Gas & Electric, Green Power Initiative, California Solar & Storage Association, California Energy Commission, The Utility Reform Network, Stem, California Energy Storage Alliance, Small Business Utility Advocates, and Tesla, Inc. support extension of the deadlines for Working Group Two. The Office of Ratepayer Advocates did not oppose the motion. There were no objections to the deadline extensions.

The October 2, 2017 Scoping Memo of Assigned Commissioner and Administrative Law Judge established the scope and deadlines for a set of working groups to consider revisions to California’s Rule 21. Working Group Two was tasked with addressing five issues related to the Integration Capacity Analysis and streamlining the interconnection process. The deadline for the

Working Group Two proposal was initially established as August 15, 2018, and the deadline for comments on the Working Group Two proposal was initially September 15, 2018. Due to stakeholders' need for more time to complete the tasks assigned to Working Group One, on January 25, 2018, the California Solar & Storage Association (then named the California Solar Energy Industries Association) filed a motion to extend the timelines for Working Group One, and to delay the start of Working Group Two and extend some deadlines for Working Group Two. On February 14, 2018, Administrative Law Judge Kelly Hymes granted this motion, extending by four weeks the deadlines for Working Group Two's proposal and comments on that proposal to September 15 and October 15, 2018, respectively.

Working Group Two has been working diligently to address the issues assigned to it. However, during this process, it has become clear that additional time is necessary to fully address the relatively complex issues tasked to the group. Through the groups discussions we have identified numerous sub-issues and layers to the ICA implementation, and related automation and streamlining issues, that require more time than originally anticipated. Allowing additional time for the group to complete its work would allow stakeholders to better achieve consensus and increase the likelihood that each issue can be properly fleshed out before reporting out.

For these reasons, IREC and the other stakeholders in Working Group Two request that the schedule be extended by six weeks, with an option to extend further if the working group members can demonstrate it is necessary. The working group proposes to provide the Administrative Law Judge with monthly email status updates sent to the service list of R.17-07-007. If the working group determines further discussion would be fruitful, the working group will identify that need in the monthly email status update. These updates will include a brief

summary of the progress made by Working Group Two, issues still to be resolved, and a proposed timeline and plan for addressing them. While the working group genuinely hopes to be able to resolve the issues efficiently, the complexity of this first-of-its-kind effort make it difficult to guarantee our work will be completed with only six additional weeks. This proposal will preclude the need for further motions on this issue and keep the Administrative Law Judge fully apprised of the group's progress.

At this time, IREC and the other stakeholders actively participating in Working Group Two request the following changes to the schedule:

- Extend the deadline for the Working Group Two Proposal from September 15, 2018 to October 31, 2018.
- Extend the deadline for comments on the Working Group Two Proposal from October 15, 2018 to November 30, 2018.
- Allow monthly status updates to be used for further discussion about these deadlines.
- Extend the deadlines for Working Groups Three through Six by ten weeks, according to the schedule below, to reflect the six-week extension proposed in this Motion and the four-week extension granted in the February 14, 2018 Email Ruling Revising Schedule and Reassigning Issue Six.

Schedule for Working Groups Three through Six	Current Schedule	Proposed
Working Groups Three through Six begin to meet	September 1, 2018	November 15, 2018
Status reports filed and served	December 1, 2018	February 15, 2019
Working Groups Three through Six proposals filed	March 1, 2019	May 15, 2019
Workshop to discuss and present proposals	March 15, 2019	May 31, 2019
Ruling issued requesting comments on proposals	April 1, 2019	June 15, 2019

Parties file comments on proposals	May 1, 2019	July 15, 2019
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IREC and the Working Group Two stakeholders appreciate the Commission's consideration of this Motion.

DATED: July 9, 2018

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By: /s/ Laura D. Beaton

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